

### **REMARKS**

As a preliminary matter, Applicant thanks the Examiner for the withdrawal of the previous anticipation rejection based only upon the Song reference (U.S. 6,710,837).

Claims 22 and 26 stand rejected under 35 U.S.C. 102(e) as being anticipated by Yoon et al., which is listed in the Office Action as “U.S. 6,710,837.” U.S. 6,710,837, however, is the reference number to the previously cited Song reference. Applicant presumes that the Examiner meant to refer to Yoon as. “U.S. 6,593,982,” which is elsewhere correctly listed (paragraph 2) in the Office Action. Based on this assumption, Applicant respectfully traverses the rejection because Yoon does not teach pattern-cut slits as orientation control elements, as in independent claim 22 of the present invention, as amended.

The Examiner asserts that Yoon’s opening pattern 51 and depression pattern 81 are collectively equivalent to the first orientation control element of the present invention, and that branches of the depression pattern 81 (located at regions A-D in Fig. 10) are analogous to the second orientation control element of the present invention. According to these assertions, Yoon cannot read upon amended claim 22 of the present invention. Neither of Yoon’s pattern 81 or its branches are pattern-cut into the pixel electrode itself. Quite the contrary, Yoon clearly teaches that the pattern 81 is formed from following the contours of gaps in the color filters 61 below the pattern. (See col. 8, lines 46-54).

In contrast, claim 22 of the present invention now more clearly recites, among other things, that the first and second orientation control elements of the present invention are themselves pattern-cut slits formed in the pixel electrode itself. Yoon cannot anticipate such

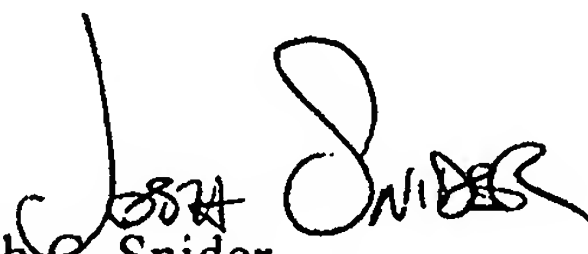
features. Cut slits may be formed into significantly different patterns than the depression patterns formed by Yoon. Yoon's depression patterns 81 are restricted to only the contours of the color filters below them, whereas the cut slits of the present invention may be formed into any pattern desired by the present inventors, irrespective of the color filters. Support for these amendments can be found at least at page 27, lines 17-28 of the present Specification. Accordingly, for at least these reasons, the Section 102 rejection based on Yoon is respectfully traversed.

Claims 34 and 35 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Yoon in view of Song. As discussed above, the Examiner has mistakenly listed both of these cited references by the same reference number. Applicant therefore respectfully traverses the rejection based on the same assumptions made above, and for the same reasons discussed above. Claims 34 and 35 depend directly or indirectly from independent claim 22, and therefore include all of the features of the base claim, plus additional features. Song similarly fails to show that the apertures 270 are pattern-cut into the pixel electrode itself. As also discussed above, the pattern-cut slits of the present invention realize significant advantages and versatility over both of Yoon's depression patterns 81 and Song's linear apertures 270. Accordingly, the Section 103 rejection based on a combination of Yoon with Song is also respectfully traversed.

For all of the foregoing reasons, Applicant submits that this Application, including claims 22, 26, and 34-35, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if a further interview would help expedite prosecution.

Respectfully submitted,  
GREER, BURNS & CRAIN, LTD.

By

  
Josh C. Snider  
Registration No. 47,954

**Customer No. 24978**

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300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
Telephone: (312) 360-0080  
Facsimile: (312) 360-9315  
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